

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

HANS MOKE NIEMANN,

Plaintiff,

v.

SVEN MAGNUS ØEN CARLSEN A/K/A  
MAGNUS CARLSEN, PLAY MAGNUS AS  
D/B/A PLAY MAGNUS GROUP, CHESS.COM,  
LLC, DANIEL RENSCH A/K/A “DANNY”  
RENSCH, AND HIKARU NAKAMURA,

Defendants.

Case No. 4:22-cv-01110-AGF

**DECLARATION OF NIMA H.  
MOHEBBI IN SUPPORT OF  
DEFENDANT PLAY MAGNUS AS D/B/A  
PLAY MAGNUS GROUP’S MOTION TO  
DISMISS PLAINTIFF’S SECOND  
AMENDED COMPLAINT**

Hon. Audrey G. Fleissig

I, Nima H. Mohebbi, make this declaration in support of Play Magnus AS d/b/a Play Magnus Group’s (“Play Magnus’s”) Motion to Dismiss Plaintiff’s Second Amended Complaint, submitted herewith in the above-captioned suit. I hereby declare that:

1. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could and would testify competently thereto.
2. I am an attorney and a member in good standing of the State Bar of California. I am admitted *pro hac vice* to practice before this Court in this matter. I am a Partner with the law firm of Latham & Watkins LLP, counsel of record for Defendant Play Magnus.
3. I have reviewed a video published by chess24 on YouTube that is dated September 19, 2022 and titled “Champions Chess Tour: Julius Baer Generation Cup | Prelims Day 2 | Tania Sachev & Peter Leko.” Plaintiff Hans Niemann quotes from this video in his Second Amended Complaint (“SAC”) and relies on the contents of this video in support of his defamation claims. (See SAC ¶ 120.) The video is publicly available on chess24’s YouTube channel at

<https://www.youtube.com/watch?v=RNngyBUH4ao>. A screenshot of the beginning portion of the video is below:



4. On March 20, 2023, my law firm contracted TransPerfect Translations Limited, a third-party professional translation agency and international communications firm, to transcribe minutes 00:16:34 through 00:44:14 of the video published on chess24's YouTube channel. This portion of the video includes the dialogue between Lawrence Trent and Tania Sachdev—the dialogue from which Niemann quotes in his SAC. (See SAC ¶ 120.) A true and correct copy of the transcript of minutes 00:16:34 through 00:44:14 of the video as it appeared on chess24's YouTube channel on September 19, 2022, along with a certification of competency by TransPerfect, is attached hereto as **Exhibit 1**.

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11th day of April, 2023 at Los Angeles, California.



Nima H. Mohebbi

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on April 11, 2023, the foregoing document was served on all counsel of record by ECF.

DATED: April 11, 2023

/s/ Nima H. Mohebbi

Nima H. Mohebbi (# 275453CA)  
Attorney for Defendant Play Magnus  
AS d/b/a Play Magnus Group  
**LATHAM & WATKINS LLP**  
355 S. Grand Ave., Suite 100  
Los Angeles, CA 90071  
Tel: (213) 485-1234